

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

(1) ANTJUAN L. MARTIN,)
)
Plaintiff,)
) Case No. CIV-13-1064-D
v.)
)
(1) CITY OF OKLAHOMA CITY,)
(2) BILL VETTER,)
(3) RYAN SORRELS,)
(4) RUSSELL MOCK,)
(5) JACOB MCCLAIN,)
(6) WILLIAM CITY,)
)
Defendants.)

OBJECTIONS OF DEFENDANTS, OKLAHOMA CITY POLICE
LIEUTENANT BILL VETTER, LIEUTENANT RYAN SORRELS,
SERGEANT RUSSELL MOCK AND SERGEANT JACOB MCCLAIN TO
PLAINTIFF'S WITNESS AND EXHIBIT LISTS

COME NOW the defendants, Oklahoma City Police Lieutenant Bill Vetter, Lieutenant Ryan Sorrels, Sergeant Russell Mock and Sergeant Jacob McClain, and object to plaintiff's witness and exhibit lists as follows:

OBJECTIONS TO WITNESSES

| No. | Witness | Objection |
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| 7 | Any police personnel involved in the investigation of the citizens' complaints | Relevance; FRE 401, 402 and 403; overly broad, vague, plaintiff has failed to identify specific witnesses; further, plaintiff has failed to identify to what "citizens' complaints" he refers. |

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| 8 | Any police personnel present at the scene of the subject incident | Relevance; FRE 401, 402 and 403; overly broad, vague, plaintiff has failed to identify specific witnesses. |
| 10 | All of Plaintiff's Medical Providers | Relevance; FRE 401, 402 and 403; overly broad, vague, plaintiff has failed to identify specific witnesses. |

OBJECTIONS TO EXHIBITS

| No. | Exhibit | Objection |
|-----|---|--|
| 1 | Video of incident. | Lack of authenticating or identifying evidence, FRE 901; further, the referenced video, as produced by plaintiff to these defendants, fails to record the entire incident at issue in this lawsuit; original photograph (videotape is included in the definition of photograph) required, FRE 1002 |
| 2 | Related police reports. | Objections reserved pending specific identification of these reports. |
| 4 | Citizens' complaint of Antjuan Martin. | Hearsay; FRE 801, 802 |
| 5 | Citizens' complaint of Tanner Jacobs. | Hearsay; FRE 801, 802 |
| 6 | All notes and records related to the investigation of the citizens' complaints. | Relevancy; FRE 401, 402, 403 |
| 8 | Plaintiff's relevant medical records and reports. | Objections reserved pending plaintiff's production of those medical records and reports he deems "relevant." |

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|----|--|--|
| 10 | Relevant portions of OKCPD policies and procedures. | Relevancy; FRE 401, 402, 403 (violation of police regulation is insufficient to state a claim alleging a constitutional violation, <i>i.e.</i> , excessive force). <i>Romero v. Board of County Commissioners</i> , 60 F.3d 702, 705 (10 th Cir. 1995)) |
| 12 | Published news articles related to bounty hunters operating in Oklahoma County. | Relevancy; FRE 401, 402, 403 Hearsay; FRE 801, 802 |
| 13 | Relevant sections of Oklahoma City Municipal Code. | Objections reserved pending plaintiff's production of those sections of Oklahoma City Municipal Code he deems "relevant." |
| 14 | Statistical and related information regarding IWOP incidents, arrests, and prosecutions. | Relevancy; FRE 401, 402, 403; Hearsay; FRE 801, 802; further objections reserved pending production of this exhibit by the plaintiff. |
| 16 | Exhibits offered in rebuttal by Plaintiff. | Objections reserved pending production of these exhibits by the plaintiff. |
| 17 | Exhibits identified in discovery. | Relevancy; FRE 401, 402, 403; further objections reserved pending production of these exhibits by the plaintiff. |
| 18 | Documents yet to be produced by Defendants per discovery requests. | Documents have been produced. |
| 19 | All documents produced <i>via</i> subpoena or third parties. | Relevancy; FRE 401, 402, 403; further objections reserved pending production of these exhibits by the plaintiff. |

Respectfully submitted,

/s/ Susan Ann Knight

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Oklahoma City Police Lieutenant Bill Vetter,
Lieutenant Ryan Sorrels, Sergeant Russell Mock
and Sergeant Jacob McClain

CERTIFICATE OF MAILING

This is to certify that on this 3rd day of November, 2014, a true and correct copy of the above and foregoing was served on the following, who are registered participants of the ECF System:

Nathan H. Harper
4901 W. Reno, #270041
Oklahoma City, OK 73137

Richard C. Smith
Jennifer Warren
Municipal Counselor's Office
200 North Walker
Oklahoma City, OK 73102

/s/ Susan Ann Knight

Susan Ann Knight